

Exhibit B

Blume, Michael (USANYE)

From: Caleb Kruckenberg <CKruckenberg@pacificlegal.org>
Sent: Thursday, February 16, 2023 3:57 PM
To: Stamatelos, Pauline (USANYE)
Cc: Marutollo, Joseph (USANYE); Blume, Michael (USANYE); Merenda, Jill (USANYE); Steve Simpson; Jonathan Houghton
Subject: RE: [EXTERNAL] RE: USA v. Rare Breed Triggers, LLC, 23-cv-369

Ms. Stamatelos:

I'm in receipt of your emails. I understand your more targeted requests within the larger document requests, and we are in the process of searching for and/or compiling responsive documents. We will produce appropriate documents on a rolling basis as soon as we can.

I will note that in your first email you said that you expected a response by Monday, February 20th, and today you have said you expect a response no later than Friday, February 17th. Consistent with your first demand, I will send you a formal response with appropriate objections on Monday. Meanwhile, if we are able to produce responsive documents sooner, we will.

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From: Stamatelos, Pauline (USANYE) <Pauline.Stamatelos@usdoj.gov>
Sent: Thursday, February 16, 2023 1:22 PM
To: Caleb Kruckenberg <CKruckenberg@pacificlegal.org>
Cc: Marutollo, Joseph (USANYE) <Joseph.Marutollo@usdoj.gov>; Blume, Michael (USANYE) <Michael.Blume@usdoj.gov>; Merenda, Jill (USANYE) <Jill.Merenda@usdoj.gov>
Subject: RE: [EXTERNAL] RE: USA v. Rare Breed Triggers, LLC, 23-cv-369

Counsel, please see attached.

During the parties' February 13 meet and confer, Defendants stated that they would agree to produce documents and communication to discovery demands on an expedited and rolling basis (consistent with the Court's order), so long as the United States narrowed its document demands to RBT's and RFT's connections to New York State. The United States sent the below email on February 14 narrowing the United States' document demands; Defendants' response to this email remains outstanding.

Defendants had offered to produce information relating to RBT's retail customers with mailing addresses located in New York State to whom RBT sold or transferred FRT-15s and WOTs. Although Defendants initially refused to produce its business records showing all wire transfers made into bank account number 693581008 at JPMorgan Chase on behalf of RBT, among other business records regarding this account with